

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

FINJAN SOFTWARE, LTD., an Israel corporation,	)	
	)	
Plaintiff-Counterdefendant,	)	C. A. No. 06-369-GMS
	)	
v.	)	
	)	
SECURE COMPUTING CORPORATION, a Delaware corporation, CYBERGUARD, CORPORATION, a Delaware corporation, WEBWASHER AG, a German corporation and DOES 1 THROUGH 100,	)	
	)	
Defendants-Counterclaimants.	)	

**REPLY TO AMENDED COUNTERCLAIMS OF DEFENDANTS SECURE  
COMPUTING CORPORATION AND WEBWASHER AG**

Plaintiff and Counterclaim Defendant, Finjan Software, Ltd. ("Finjan"), responds to the amended counterclaims, set forth by Secure Computing Corporation and WebWasher AG, in the Amended Answer and Counterclaims of Defendants Secure Computing Corporation, Cyberguard Corporation, and WebWasher AG ("Counterclaims") as follows:

1. Finjan admits that Defendant Secure Computing Corporation is a corporation organized and existing under the laws of the State of Delaware, with its corporate headquarters at 4810 Harwood Road, San Jose, California 95124. Except as thus expressly admitted, Finjan lacks knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 35 of the Counterclaims and on that basis denies those allegations.
2. Finjan admits the allegations of Paragraph 36 of the Counterclaims.

3. The allegations in Paragraph 37 are legal conclusions and do not require a responsive pleading. To the extent a response is required, Finjan does not dispute that the counterclaims are an action for a declaratory judgment and that there is an actual controversy between Finjan and Secure Computing.

4. The allegations in Paragraph 38 are legal conclusions and do not require a responsive pleading. To the extent a response is required, Finjan does not dispute that jurisdiction is proper under 28 U.S.C. §1338(a) and under the Federal Declaratory Judgment Act, Title 28, sections 2201 and 2202 and that personal jurisdiction over Finjan and venue within this judicial district is proper.

5. Finjan admits the allegations of Paragraph 39 of the Counterclaims.

6. Finjan denies the allegations of Paragraph 40 of the Counterclaims.

7. Finjan denies the allegations of Paragraph 41 of the Counterclaims.

8. Finjan denies the allegations of Paragraph 42 of the Counterclaims.

9. Finjan denies the allegations of Paragraph 43 of the Counterclaims, and the denial extends to the allegations in Paragraphs 24-33 of the Counterclaims that were incorporated into Paragraph 43 of the Counterclaims by reference.

10. Finjan denies the allegations of Paragraph 44 of the Counterclaims.

**PRAYER FOR RELIEF**

WHEREFORE, Finjan denies that Secure Computing Corporation, Cyberguard Corporation, and WebWasher AG are entitled to any judgment or relief in their favor, including the relief in paragraph A through E of the Prayer for Relief.

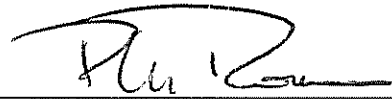
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Dated: September 15, 2006  
750397

By: \_\_\_\_\_



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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF DELAWARE**  
**CERTIFICATE OF SERVICE**

I, Philip A. Rovner, hereby certify that on September 15, 2006, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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\_\_\_\_\_  
/s/ Philip A. Rovner

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